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Attorneys for Defendant Mark Groussman

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CREIGHTON TAKATA, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

RIOT BLOCKCHAIN, INC. F/K/A,
BIOPTIX, INC., JOHN O'ROURKE,
JEFFREY G. MCGONEGAL, BARRY
HONIG, CATHERINE DEFRANCESCO,
MICHAEL BEEGHLEY, JOHN
STETSON, MARK GROUSSMAN,
ANDREW KAPLAN, MIKE DAI, JASON
LES and ERIC SO,

Defendants.

Civil Action No. 18-cv-2293 (FLW) (ZNQ)

Document electronically filed

Oral Argument Requested

**DECLARATION OF KEVIN G. WALSH IN
SUPPORT OF DEFENDANT MARK
GROSSMAN'S REPLY IN SUPPORT OF
MOTION TO DISMISS PLAINTIFF'S
CORRECTED CONSOLIDATED
AMENDED CLASS ACTION
COMPLAINT**

I, **KEVIN G. WALSH**, hereby declare:

1. I am an attorney at law duly admitted to practice before the courts of the State of New Jersey. I am a Direct with the law firm of Gibbons P.C., counsel of record for Defendant Mark Groussman ("Groussman") in the above-captioned matter. I submit this Declaration in support of Groussman's Reply in Support of his Motion to Dismiss Plaintiff's Corrected Consolidated Amended Complaint. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would competently testify thereto.

2. Attached hereto as **Exhibit A** is a true and correct copy of a Schedule 13G/A filed on February 15, 2018 with the Securities and Exchange Commission and made available on Riot Blockchain, Inc.'s website at <https://ir.riotblockchain.com/sec-filings>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed Newark, New Jersey on this 4th day of November 2019.

s/ Kevin G. Walsh
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